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Interim Lead Counsel for the Direct Purchaser Plaintiffs

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**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

IN RE: CATHODE RAY TUBE (CRT)  
ANTITRUST LITIGATION

This Document Relates to:

**ALL DIRECT PURCHASER ACTIONS**

Master File No. CV- 07-5944-SC

MDL No. 1917

**DECLARATION OF R. ALEXANDER  
SAVERI IN SUPPORT OF SAVERI &  
SAVERI, INC.'S OPPOSITION TO SHARP  
MOTION TO COMPEL**

Date: September 20, 2012

Time: 2:00 p.m.

Judge: Honorable Charles A. Legge (Ret.)

JAMS: Two Embarcadero Center, Suite 1500

1 I, R. Alexander Saveri, declare:

2 1. I am a partner with Saveri & Saveri, Inc. ("Saveri"), Interim Lead Counsel for  
3 Direct Purchaser Plaintiffs in this litigation. I am a member of the Bar of the State of California  
4 and an attorney admitted to practice in the Northern District of California. I make this Declaration  
5 in Support of Saveri & Saveri, Inc.'s Opposition to Sharp's Motion to Compel Saveri & Saveri,  
6 Inc. to Comply with Subpoena. Except as otherwise stated, I have personal knowledge of the facts  
7 stated below.

8 2. The discovery produced in this litigation consists of over five million pages of  
9 documents.

10 3. Defendants have produced documents over several years via scores of transmittals  
11 in a myriad of formats. For example, Defendants have produced documents via CD-ROM, via  
12 hard drive, via emailed zip files, via emailed pdf files; and via FTP website.

13 4. Although Saveri has laboriously transferred all of these files to a server, the  
14 documents are contained in separate files. I estimate that it will take at least 30 to 40 hours of labor  
15 by Saveri's IT department to comply with the subpoena.

16 5. While Saveri might be able to outsource some of the work of complying with the  
17 subpoena, much of it will occupy personnel who have more important and productive things to be  
18 doing.

19 I declare under the penalty of perjury under the laws of the United States of America that the  
20 foregoing is true and correct.

21 Executed the 15th day of September, 2012, in San Francisco, California.

22  
23 /s/ R. Alexander Saveri  
R. Alexander Saveri

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